



U.S. Department of Justice

United States Attorney
Southern District of New York

August 4, 2023

VIA ECF

The Honorable John P. Cronan
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Reclaim the Records et al., v. U.S. Dep't of State*, 23-cv-01650 (JPC)

Dear Judge Cronan:

This Office represents the U.S. Department of State (the “Government” or “State Department”)) in the above-referenced action brought under the Freedom of Information Act (“FOIA”). We write jointly with Plaintiffs Reclaim the Records and Alec Ferreti (“Plaintiffs”) to provide the Court with a status update pursuant to the Court’s July 20, 2023, Order. *See* ECF No. 16.

Despite good faith efforts to resolve this matter without the Court’s intervention, the parties have reached an impasse as to the scope of Plaintiffs’ requested search. Accordingly, we propose the following briefing schedule for summary judgment:

- Government’s motion for summary judgment: November 1, 2023;
- Plaintiffs’ opposition to the Government’s motion: December 13, 2023;
- Government’s reply to Plaintiff’s opposition: January 12, 2024.

The parties’ proposed schedule is necessary to accommodate Plaintiffs’ counsel’s paternity leave, time for new agency counsel at the Department of State to acclimate to this matter, as well as the holidays.

We thank the Court for its consideration of this letter.

Respectfully,

BELDOCK LEVINE &
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Attorney for Plaintiffs

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